



PARISH COUNCIL OF EYNSFORD

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11th December 2025

FAO: Planning Policy Sevenoaks District Council

Dear Sir/Madam

We have several concerns over the Reg 18 Consultation of the Sevenoaks District Local Plan.

Consultation Process

The short summary document only shows two options - Option 1 and Option 2, whereas the online consultation includes all three options including 'None of the Above'

This summary document does not mention that a 28,000 seat stadium is included in Option 1.

Many people, even those proficient in the use of computers, have found the SDC website and response forms very difficult to find and to navigate. In fact this year there are two separate forms to negotiate. This has deterred many people from responding. The alternative paper forms are inadequate. A full paper response form would have made the consultation much more accessible to many people.

General

Eynsford Parish Council wish to formally object to the continued development of 'Plan 2042, A new Local Plan for Sevenoaks District' in its current form, as we believe it is unlikely to meet the 'Test of Soundness' as set out in the National Planning Policy Framework.

We are very concerned about the inclusion of sites in Green Belt and the excessive housing target. We would like to know if you have challenged the government on the numbers of units required for our area which is 93% Green Belt and with large areas of National Landscape.

We are extremely concerned that many of the Green Belt sites you have selected for development would not have been labelled as 'Grey Belt' if a developer had not put them forward. Was the designation developer-led or was it strategically planned by Sevenoaks District Council?

Whilst much of the policy in the document is good, we do not believe the policies are reflected in the site allocations.

We support new housing in the district, specifically low cost/affordable housing, social housing, small units including rental properties, and accessible housing. There is no need for more 4 or 5

bedroom houses. We support development within urban areas, use of existing buildings, and development on brownfield sites.

Yours sincerely,



Holly Ivaldi, Clerk
On behalf of Eynsford Parish Council

PED1

Eynsford Parish Council strongly objects to the inclusion of Pedham Place in the Local Plan. We believe this site should be removed from the Plan as it is not suitable for development.

An informal survey of residents of Eynsford and Farningham resulted in 92% being opposed to the proposed development at Pedham Place.

Together with the parishes of Farningham and Crockenhill we have commissioned a report from an independent planning consultant and this supports our arguments. The report is available on request.



View of Pedham Place from Eynsford.

Green Belt and National Landscape

Pedham Place is in a strongly performing area of the Green Belt and is an important part of the North Downs National Landscape. The NPPF (Dec 2024) remains clear that the government still attaches great importance to the Green Belt (para. 142) and that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced. The recent amendments to the NPPF, whilst seeking to facilitate housing delivery do not weaken the Green Belt protection afforded to Pedham Place and continue to place great weight on the value of National Landscapes.

Sevenoaks District Council's own Green Belt Assessment (2023) cites the Pedham Place site as making an important contribution to the wider Green Belt and that it is not recommended for further consideration.

Pedham Place is highly performing in fulfilling the purposes of green belt as defined by the NPPF:

- a) It checks the outward urban sprawl from Greater London
- b) It prevents the merging of settlements – i.e. Farningham and Eynsford with Swanley
- c) It safeguards the countryside from urban encroachment
- d) It helps to preserve the settings and special character of the historic villages of Farningham and Eynsford which contain many listed buildings, conservation areas and the important Norman Eynsford Castle. Pedham Place is also the setting of the Farningham Fort.

The NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty within National Landscapes. The North Downs are currently being put forward for UNESCO designation as part of the Cross Channel GeoPark project. This encompasses the chalk downland in both Kent and northern France.

Pedham Place is currently used mainly as a golf course, with a small section used for car boot sales and the rest is covered by trees, shrubs, and unmanaged grasslands. Only 3% of the site is covered by any built form, so it cannot be classed as 'previously developed' land.

Location as a Sustainable Standalone Settlement

The NPPF is very clear that that new housing development should be in locations that can be made sustainable and offer a genuine choice of transport modes. Pedham Place is not located near a train station and there is very limited options for a variety of transport modes. It is likely that most households will be reliant on cars for transport.

The proposals are not considered to be feasible for a standalone settlement in a sustainable location for several reasons. Settlements of 2,500 homes should be located on the edge of an existing town (urban extensions) to benefit from existing services and transport connections. Standalone settlements need to provide at least 10,000 new homes to create self-sufficient settlements with new facilities and large-scale public transport infrastructure. The Pedham Place proposals are closer in scale to an urban extension to an existing town but is instead being promoted as a standalone settlement. It is not connected to an existing town and is separated from Swanley by the M25 and M20 motorways and Swanley Interchange junction, limiting safe and accessible connections into Swanley.

We believe Pedham Place is not appropriate for a standalone settlement because it is not large enough to work as a self-sufficient settlement. It is also not capable of expanding in size to meet the criteria for a new town due to the site's location in a National Landscape, Green Belt and its setting within the environmentally sensitive Darent Valley. Building a settlement of insufficient size would just lead to even more car journeys, as well as imposing an additional burden upon facilities in the existing towns and villages.

The site is not within easy walking distance of the railway stations at Swanley or Eynsford. The proposed 'travel hub' would provide a bus service to Swanley station as well as other on-demand transport options. Whilst, in theory these look good, for most people, using a car will be preferable. The current road system would not be suitable for a commuter/rush hour bus service. The M25 junction is often gridlocked with significant tailbacks travelling into Swanley

which would mean regular delays. An alternative route via Wested Lane is extremely narrow and not suitable for large vehicles. No alternative road route has been discussed with Kent Highways.

Even if the developer implements their proposed improvements to junction 3 of the M25 and exits onto the A20, the massive increase in motor vehicles (at least 5000 just for the residential development) would have a huge impact on the local roads and infrastructure. The A20 is already a notorious accident black spot, and the M25 is regularly at a standstill. Traffic avoiding these roads often use the lanes around Eynsford and Farningham as an alternative. However, Wested Lane, Crockenhill Lane and Sparepenny Lane are narrow rural roads and in many places are only one car wide. The A225 would take traffic through the centre of Eynsford which already suffers from congestion and contains a primary school. It is unrealistic to say that new residents of Pedham Place would not be reliant on cars for transport.

Existing public transport is distant and sparse from Pedham Place. Swanley and Eynsford stations would both be about 2 miles from the site. Google Maps suggests it would take new residents at least 45 minutes to walk to Swanley train station and on average it would be quicker for them to walk to Eynsford station. Most people would not consider walking that far for their daily commute to work or school. Walking to Swanley would involve crossing over J3 of the M25, or an even longer route via Crockenhill. Eynsford station has very limited parking and users already park in the surrounding residential streets. It cannot accommodate such a large influx of car driving users. Current bus services are limited. Currently from Farningham to Swanley there are 2 early morning services, then the next service is at 2.37pm with two early evening services. These are unlikely to cope with the demand from 7,000 new residents. The developer suggests providing a bus service through Crockenhill, also a route with very narrow lanes and not suitable for a bus service.

Provision of other infrastructure including employment space, schools and other facilities are included in the plan. Analysis has shown that the onsite employment provision would not be sufficient for a standalone settlement. This would lead to many of the new residents commuting for work to London or other places. Local demand for school places has decreased with the primary school in Eynsford reducing the number of classes and increasing its catchment area. Extra provision is not required in the district, however, if demand increases there is potential to redevelop the closed Oasis Academy in Hextable and the Birchwood Site in Swanley for SEN which would have much better links to public transport than a school at Pedham Place.

Environmental Issues

A development at Pedham Place would be detrimental to the Green Belt and National Landscape. Pedham Place is an area of chalk grassland and an important wildlife corridor.

Chalk grassland is internationally rare and is often referred to as Europe's rainforest because of its biodiversity. It is home to many species of wildlife, some of which are protected and include: roe deer, various species of bats, badgers, skylarks, tawny owls, red kites, buzzards, fieldfare, redwing and goldfinches. The rough areas are filled with native chalk flowering plants such as bee orchids. Mature native trees surround parts of the site. It is open to the public and

a designated footpath runs through it.



Views of Pedham Place

Pedham Place is in an elevated position and would be visible from many parts of the district. Currently there is no motorway lighting in this area due to the protected status of the Darent valley landscape. The creation of a settlement would add light and noise pollution to the dark skies of the Kent Downs National Landscape, an environmentally sensitive area.

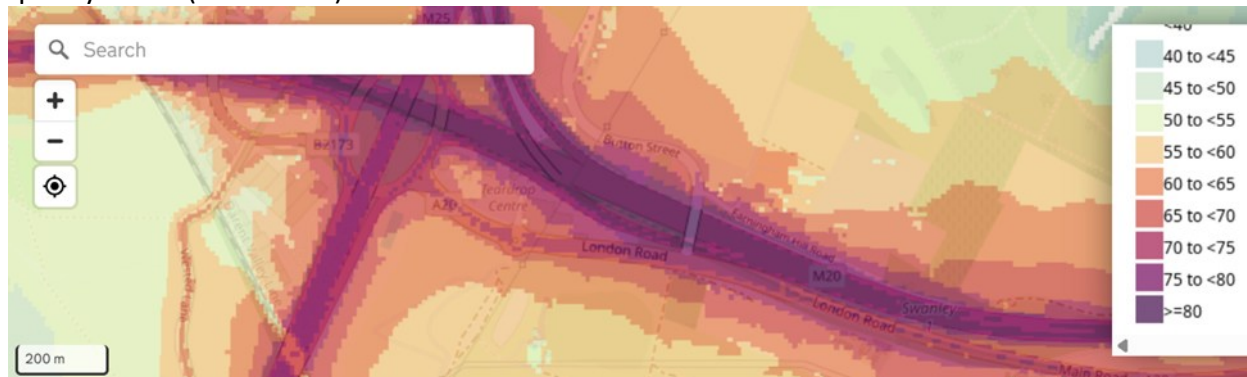
The Darent valley is home to the River Darent one of only 200 chalk streams in the world. We understand there is no existing surface drainage in the vicinity Pedham Place and there are concerns about the water infiltration capacity of the land given its history as landfill. There are very serious local concerns that it would not be possible to mitigate the impacts of the surface water runoff from a developed Pedham Place into the River Darent and surrounding residential areas.

The current usage of Pedham Place provides a good balance of amenity value to local residents as a 'pay as you go' golf club, and a popular walking route, and also an ideal habitat for wildlife as listed above. The combination of managed and unmanaged areas of grass/meadow together

with mature native trees, fruit trees, native shrubs and undisturbed areas promote sustainable biodiversity.

We are concerned about the effect of noise pollution on the existing wildlife, new residents and surrounding communities if this proposal goes ahead. This section of the M25 already produces high noise levels as set out here.

The DEFRA Strategic Noise Mapping produced as part of the Environmental Noise (England) Regulations 2006, shows high road traffic noise levels (parts of the site in excess of day LAeq 65dB – see extract below from the Strategic map) which will give rise to Significant Observed Adverse Effects defined in the Noise Policy Statement for England (NPSE). Such effects should be avoided as this level of noise exposure has significant adverse effects on the health and quality of life (from NPSE).



Increased car ownership and congestion will have an adverse effect on the air quality in this area.

Conclusion

- There is no need for a standalone development at Pedham Place, Pedham Place is a valuable/highly performing part of the Green Belt and the National Landscape
- There is almost no local support for a development at Pedham Place
- SDC have shown no exceptional circumstances for developing this site or for removing it from the Green Belt.
- The site is not suitable for a sustainable development as it would be reliant on car transport and is not large enough to be self-reliant.
- It would result in the loss of a popular local amenity/recreational facility and an important wildlife habitat.

SWAN 17

Inclusion of site SWAN17 - Land at Petham Court in Crockenhill for a 110,000 sq/m Stadium, Hotel, Sport, Leisure and Medical Uses.

Eynsford Parish Council strongly objects to the proposal for the construction of a 28,000 capacity stadium on the land at Petham Court, Ref SWAN17.

Other major concerns are:-

- 1) **Landscape Impact** - The proposed development would cause irreversible damage to the open countryside and the rural setting of Crockenhill. The site lies within Green Belt and

a quarter of the site is within National Landscape. The proposed site is currently in use as agricultural land and community allotments.

- 2) **Location:** - the site is highly constrained by the current road network, housing and other land boundaries – it is hard to understand how the proposed infrastructure will be allocated to these spaces. The site is not within walking distance of a railway station and is therefore unsuitable for large numbers of visitors. Its location in the small village of Crockenhill is baffling.
- 3) **Transport Impact:-** No comprehensive transport plan has been produced to demonstrate transport strategy and crowd dynamics for spectators (up to 28,000) entering and exiting the venue. It is likely that this development would result in a large increase in road transport in an already congested area.
- 4) **Noise and Light Impact Assessment:-** The noise and light pollution would have the potential to cause significant adverse impact on the local community. No light and noise impact study has been produced.
- 5) **Demand:** We have seen no evidence provided of the need for a rugby stadium or arena in our area or the district as a whole. Eynsford Parish Council has received no request for a rugby pitch of any description in the past 20 years.
- 6) **Local Benefit:** - We believe that any local benefit e.g. casual employment opportunities will be outweighed by the negative impacts of this development on the environment, quality of life, noise and air pollution, increased carbon emissions and congestion.
- 7) **Viability:** - We understand that the development of a stadium in this location is completely unviable for any developer/owner operator. We understand this has been confirmed by a leading stadium and arena developer who has informed Sevenoaks District Council that such a scheme is NOT viable as there is no business case to support this type of development in this location. It is pure fiction. Sports, music and leisure facilities are very well catered for in the South East.

Eynsford Parish Council considers that this proposal is wholly unsuitable for a rural village especially when there is no viable business case to develop such a scheme. It is pure fiction and should be excluded from consideration in the Local Plan.

Chapter 1 - Development Strategy

Eynsford Parish Council support SDC's assertion that "the need to protect our green and natural spaces for current and future populations has never been greater".

Paragraph 1.5 (table 1.1)

The target of 17,175 units is extremely high. We understand that the government has said 'Areas with the highest unaffordability for housing and greatest potential for growth will see housebuilding targets increase'. But this does not take into account the proportion of the district covered by Green Belt. Has this figure been challenged? We urge Sevenoaks District Council to challenge the government on this target figure and fight to preserve high-performing green belt land that gives the district its distinctive character.

Paragraph 1.8

We support the Council's statement that they are working closely with town and parish councils who are preparing and have adopted Neighbourhood Plans for their areas.

Paragraph 1.14

We query how much have brownfield and underutilised has been considered and why does the Plan not provide evidence of these sites?

Paragraph 1.24.

For reasons stated below and throughout this response we believe the proposed development at Pedham Place, PED1, should be excluded from the Plan.

Paragraph 1.25

Building on Pedham Place will have a huge impact on the National Landscape and we do not believe that it is a suitable site for the proposed development.

Paragraph 1.26

We argue that building on Pedham Place does “fundamentally undermine the purposes of the remaining Green Belt” because this part of the Green Belt does “a) check the unrestricted sprawl of large built-up areas.”. The Land at Pedham Place is crucial in stopping the spread of Swanley beyond the boundary of the M25.

Paragraph 1.39 Wasps Stadium

Eynsford Parish Council is unequivocally opposed to the proposal to construct a 28,000-capacity stadium, the proposal is wholly unsuitable for rural location and should be excluded from consideration in the Local Plan. Our full reasons for this opposition are set out in our response to policy SWAN17.

Paragraph 1.40 Pedham Place (2,500 homes)

Eynsford Parish Council is unequivocally opposed to the proposed Pedham Place development for the following reasons:

- The site is located within Green Belt and would significantly harm the Kent Downs National Landscape.
- Loss of wildlife and biodiversity and the degradation of an internationally important chalk valley
- Car ownership will be high and sustainable transport measures are not significant enough to deter car ownership, causing more congestion and pollution.
- Impact on water courses and flooding
- Proximity to the M25 and M20 creates a barrier for sustainable transport journeys by foot, bike or public transport.
- It will cause significant traffic increases on several corridors including Junction 3 of M25 and this will have a negative impact on air quality.
- At least 50% of residents with a job will need to commute outside of Pedham Place for work which will encourage car ownership and hinder sustainable growth.

Our full reasons for this opposition are set out in our response to site PED1.

Policy ST1 – a Balanced Strategy for Growth

Although we support some of the content of this Policy we cannot agree with it due to the inclusion of so much Green Belt, **a rugby Stadium in Crockenhill in Options 1 and 2**, (a surprising and worrying feature of the consultation that this was in both options) and the development of Pedham Place, a National Landscape in Option 2.

Many of the sites, including Pedham Place are not well connected by public transport. Many will only be accessible via small country lanes, and Pedham Place is only accessible via the extremely busy exit to the M25 interchange.

Furthermore, the policy states that the release is to have limited impact on the purposes of the Green Belt however the impact of building on Pedham Place will have a significant detrimental impact on the purpose of this part of the Greenbelt.

Policy ST2 - Housing and Mixed Use Site Allocation

We support a range of housing types in particular social housing, low cost housing, small units, rental properties and accessible housing.

We support building in urban areas and on brownfield sites. We would support limited infilling in Green Belt areas e.g. along existing roads where there is already some housing. However, we are concerned with the size of many of the Green Belt areas proposed for development. They will swamp existing villages and towns.

Chapter 2 – Housing

Housing Choice for All

EPC support the principles of ‘Housing Choice for All’ to include a greater concentration of 1- and 2- bedroom homes, affordable homes, and homes for older residents across the district, however we do make the following comments in relation to the specific policies;

Policy H1 – Housing Mix

We note in paragraph 2.6 the reference to substantial growth with people with dementia and their needs, why in this case does the policy not include a plan for a dementia village?

We support that SDC plan to “provide homes built to high sustainability standards with built-in resilience to climate change and fuel poverty” but would like to see more details about this and to see changes to the planning application process to reflect this.

Policy H2 – Provision of Affordable Housing

Regarding affordable housing quotas, where possible we would prefer to see the percentage at the higher end, 40%.

We note paragraph 2.9 which states -there is a target of 30% affordable housing on brownfield sites and 40% affordable housing on greenfield sites. Does this mean affordable housing will also be built on other sites and not just brownfield and greenfield?

In paragraph 2.11 it is stated that *‘major proposals on grey belt land within Sevenoaks District must provide 50% affordable housing. This uplift reflects the Government’s aim to maximise the delivery of affordable homes on land released from the Green Belt; while ensuring developments remain viable and sustainable. The Council will apply this requirement to all qualifying grey belt proposals, in line with national policy.’* We question if this is realistic and

whether developers can deliver on this especially as your own policy goes on to acknowledge the viability.

We are extremely concerned with the developer 'get out clauses' in this policy, in particular points 10a and b. With these clauses the Green Belt land could be built on without the agreed affordable housing being provided. We believe that SDC should ensure any agreed affordable housing is actually built; a financial contribution to the Council will not house people.

Further clause 14 of Policy H2 which allows "*late-stage viability review mechanisms on larger or phased developments*" is concerning especially when considering the proposed development at Pedham Place. We argue that if following NPPF which will allow release of Green Belt for affordable housing, that it is key in the planning process and application of larger developments and not dealt with as a viability issue later in the project.

Policy H3 – Housing in Rural Areas

We support the provision of affordable housing for local people. Many young people are forced to move away from their home villages because of a lack of affordable housing.

Policy H4 – Housing for Older People

We support this policy but question why the threshold is set at 50 or more dwellings when the population is ageing and housing need for older people will be more in demand. We ask SDC to consider making this a requirement for developments of 20 or more.

Policy H5 – Build to Rent

We support the policy to provide more housing for rent. Due to the demand for housing to rent we ask SDC to consider lowering the threshold for developments of 50 or more units.

Policy H6 – Small sites

We support the policy for smaller sites. Small sites are a much more sustainable way of developing in rural areas where there is less infrastructure.

Policy H7 - Density

Housing density should be maximised in urban and brownfield areas as well as in many rural areas. Concentration on smaller properties will allow for more units whilst still allowing for open spaces. However the plan does not make it clear what densities will be achieved on each site. It is unclear why modestly increasing densities by around 5%, to help meet the district's housing requirement, has not been prioritised. Further, with Option 2, at the already congested Junction 3 of the M25, together with a 28,000 seat stadium.

CHAPTER 3 EMPLOYMENT AND ECONOMY

Policy EMP1 sets out the requirement for 40,400 sqm of additional employment floorspace which we support. However, Option 1 includes 62,231 sqm of employment floorspace- an oversupply of 21,831 sqm. We would like to see this excess land used for housing rather than using Green Belt land.

We support policy EMP4

EMP5 - We agree with the tourism and visitor economy strategy and would like to see an even greater emphasis on improved pedestrian access to local tourist attractions, especially the River Darent.

TLC1 - The balance between, commercial use, residential use and retail use, especially in town centres will have been considered in the Town Centres Strategy. We welcome that.

The provision of employment space at Pedham Place is an integral part of the Pedham Place housing proposal, which we oppose for reasons spelt out elsewhere.

We also oppose the stadium development at Petham Farm which fails criteria EMP2 d, e, f, g and h.

We have reservations about the drive-through proposed at site SEV27 mainly due to the amount of litter, potentially non-recyclable, that it would generate.

Plans for the (re)generation of Swanley and Edenbridge are welcome.

Chapter 4 – Climate Change

OB3: Ensure that tackling the challenges of climate change strongly influences all development taking place in the district – We support this objective.

OB5: Empower residents to make lifestyle choices that positively contribute to reducing carbon emissions – We would like this to be changed to ‘enable and support residents to make ...choices’.

Policy CC1 – Mitigating and Adapting to the Impacts of Climate Change

SDC should also be aware that any building on the green belt is contrary to this policy because the Green Belt as it currently stands, undeveloped, contributes to the reduction in Sevenoaks District’s carbon footprint. This policy is therefore hard to reconcile with other policies in the draft plan.

4.4 Emissions should be measured in CO2 equivalents to capture emission of other greenhouse gases.

CC1: Mitigation 1d should include ‘meeting national embodied carbon requirements.’

On a stand alone basis we do support this policy, however we refer to Site PED 1, and SWAN 17 and are concerned that Site SWAN17 will not adhere to Policy CC1. Whilst the developer has indicated that the homes at Pedham Place would be net zero there is no similar commitment in relation to the proposed 28,000-seater stadium, hotel and ancillary buildings. A development of this type will generate extremely high levels of embodied carbon (Scope 3) emissions that would not be produced at this scale if buildings were reused/repurposed (a 50-70% decrease in emissions according to United Nations research). Emissions will not only expand dramatically during construction but the lack of public transport infrastructure and reliance on cars for stadium visits, and personal journeys will add to the district’s carbon footprint on an ongoing basis. We believe that a development on this scale and at this location will not support the council's strategic goal of reducing carbon emissions and on conservative estimates suggest annual emissions of over 1000 tCO₂e per annum from the 2500 home development and nearly 650tCO₂e/year from stadium and hotel visits. This would dramatically add to the district's carbon footprint. Additionally, we do not see any ambition for the site to provide for increased

adaptation to climate change, in fact the opposite, building in green belt will further diminish the lands' ability to cope with increased levels of rainfall.

Policy CC2 – Low Carbon and Climate Resilient Development

We are disappointed by the dropping of Passivhaus certification or equivalent from development standards. Also home quality mark. Certification is a very valuable tool in ensuring design excellence. BREEAM certification is valuable also.

We understand that many of the policy statements here have not been considered in relation to site PED1. In particular, we are very concerned about the paragraph that states:-
“All proposals for major development must offset any remaining regulated carbon emissions through onsite carbon sequestration. Where it can be demonstrated that it is not feasible or practical to achieve this on site, carbon credits to the equivalent value may be purchased from projects within the District”.

We support onsite carbon sequestration as gold standard for residential and commercial developments..

Pedham Place PED 1 is both an area of green belt land and within an AONB. It has been identified in an SDC commissioned report (Arup June 2023) as an area that performs strongly against the NPPF purposes, and the report concluded the area makes an important contribution to the wider Green Belt and concluded the area should not be considered for removal from the green belt. The current on site carbon sequestration for 144 hectares of land cannot be replaced by planting some additional trees (which are likely to be carbon positive for several years after planting). We believe that that buying carbon credits to offset loss of greenbelt would be a travesty and not acceptable.

Policy CC3 – Low Carbon and Renewable Energy

We support this policy but are concerned that the policy has not been considered in full for PED 1, for example the developer's proposals do not include a plan for 10% of total energy to be generated via onsite renewable energy.

W1 – Flood Risk

We support the statement that “Development will only be permitted where It does not materially displace flood water or increase flood risk elsewhere”. W1 (1d)

Policy W3 – Water Management Stress and Efficiency

“All residential development must be built to ensure that wholesome water consumption is not greater than 110 litres per person per day.” How will this be enforced or monitored? The district already suffers from hose pipe bans most summers due to a lack of water. We support this policy but the policy has not been considered in relation to Pedham Place, PED 1

CHAPTER 5 DESIGN

DE1 - We welcome the Community Review Panel made up of residents, visitors and those who work in the District but it is important that Parish Councils are consulted as part of the Development brief. The Local Plan indicates the Pre-App process (Figure 5.1) which includes Parish Councils but we would recommend that the applicant (section 5.4 page 183) ‘shall or must’ utilise Parish Councils rather than the loose statement of ‘expected to utilise’ the local knowledge of Town and Parish Councils.

Chapter 6 – Health and Wellbeing

We note and agree with your statement and objectives on page 201 as we believe the future for healthy communities is open spaces and active travel. Our green spaces in and around Eynsford are very important for our parishioners' physical and mental health and it is important to preserve these places.

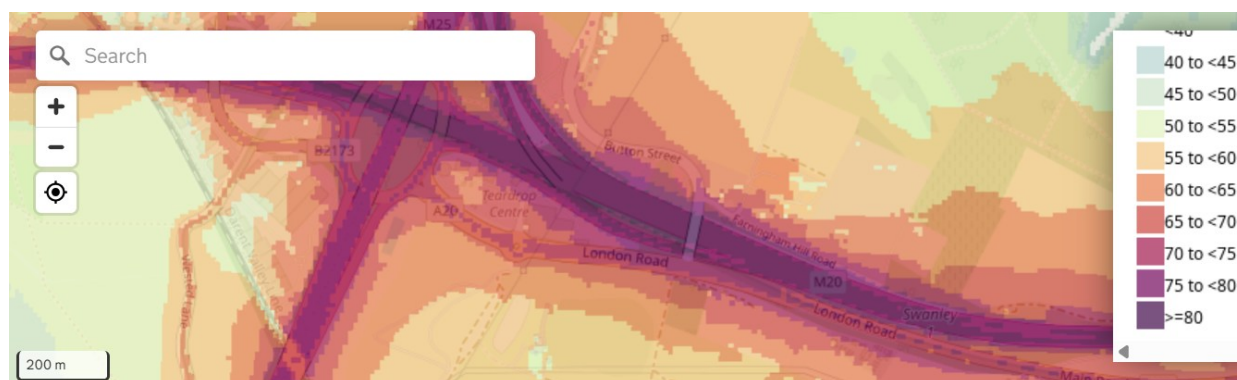
Point 6.2 states that good quality housing in a sustainable location, with access to green open space, can positively benefit social networks and opportunities for active travel. We are not persuaded that the proposals for PED1 do provide enough open spaces or promote active travel for reasons detailed in our response to PED1.

Policy AQ1 – Air Quality

We support this policy but do not believe it has been applied to the proposed development at Pedham Place.

Policy HW2 – Noise

We support this policy but do not believe it has been applied to the proposed development at Pedham Place. The DEFRA Strategic Noise Mapping produced as part of the Environmental Noise (England) Regulations 2006, shows high road traffic noise levels (parts of the site in excess of day LAeq 65dB – see extract below from the Strategic map) which will give rise to Significant Observed Adverse Effects defined in the Noise Policy Statement for England (NPSE). Such effects should be avoided as this level of noise exposure has significant adverse effects on the health and quality of life (from NPSE).



CHAPTER 7 HISTORIC ENVIRONMENT

We support the ambition to protect and enhance the district's historic environment and to ensure that it can be enjoyed by future generations. However we are concerned that proposed developments e.g. Pedham Place will have a detrimental influence on nearby historical sites and buildings. In fact there is a scheduled monument within this site PED1.

Policy HEN2 refers to the effect on heritage assets of new developments. We agree with the policy but are concerned that developers will not take this on board. For instance, PED1 will be visible from a Norman castle and church, a roman villa, a medieval bridge and many other historical buildings and structures. The current presentation by the developer makes no reference to historic sensitivity or character. PED1 is located on a National Landscape, part of the Kent Downs which is soon to receive UNESCO status, so is totally inappropriate for this development.

We support archaeological investigations as set out in HEN3.

We support the protection of locally listed buildings in HEN4

We strongly support the retention and reuse of old and historic building stock where it will not destroy any historical/architectural features. We support the reduction in carbon emissions by reusing/redeveloping existing structure. We are concerned that the majority of new housing proposed in the plan is 'new build' and will have a detrimental effect on climate change. HEN5. We support policy HEN6 and HEN7.

Chapter 8 – The Natural Environment

We support Strategic Objective OB15: 'Ensure the District retains a high quality natural environment over the period of the Local Plan including delivering biodiversity net gain on new development.'

However, we do not believe that the Pedham Place development, PED1, is consistent with this objective. It is on a ridge in a part of the district which is very visible from and within a large part of the Kent Downs National Landscape. As the previous Zone of Visual Influence (ZVI/ZVT) map (known as the purple map locally) shows, a previous iteration of PED1 which was generally one floor lower than the current 'draft proposed development' was expected to be visible from very large distances away, particularly from the south. Given the large loss of rare important natural habitat, it is inevitable that PED1 will not be able to deliver a biodiversity net gain on site, and off-site BNG provision is undesirable. Pedham place is described as free-draining chalk downland. Chalk downland is internationally rare and is often described as Europe's rainforest due to its biodiversity.

We support this statement "Developments in the AONB are expected to be limited and in line with the NPPF." "The Kent Downs...AONBs and their settings will be given the highest level of protection.", but would expect any development in the AONB to be kept to an absolute minimum.

Policy NE1

We support and compliment SDC for this Policy NE1. However as explained in our comments on Pedham Place, site PED1, we do not think PED1, can remotely satisfy many of the requirements in this policy .

You promote the Darent Valley in a Case Study – Darent Valley Landscape Recovery. We would lose a valuable part of this landscape and wildlife corridor if Pedham Place, PED1 is developed.

Policy BW2

We are extremely concerned by the halving of your proposed biodiversity net gain requirement from 20% to 10%. 8.40 states that this is because of locally constrained supply of BNG units in this emerging market. We understand that the BNG market is rapidly developing. As you explain in your case study, Darent Valley Landscape Recovery Project, aim to provide a large number of local biodiversity units and we believe that a number of other local landowners, including Kent Wildlife Trust have been working on delivering a large number of BNG units in the Darent Valley for many years. We understand the KWT continue to buy more land locally, as part of the Wilder Carbon Standards which they are leading on, we understand

they are working with a range of other landowners on projects which typically include BNG and carbon credits delivered in parallel. We would urge you to engage with KWT and consider the BNG unit pipeline which they have insight into when considering the supply of units which is expected to be available when your local plan is expected to be approved.

Chapter 9 – Infrastructure and Community

Policy IN1 Infrastructure

We are concerned that paragraph 4 of this policy would appear to permit a development without a full infrastructure contribution if perceived benefits outweigh its impacts. For example, could this mean a developer would be able to avoid costs for flood protection / drainage infrastructure, which could be damaging to the environment? If developments are to be carried out in a sustainable and sympathetic way to the environment, then infrastructure costs must not be compromised. We would expect SDC to hold developers accountable to their promises in the provision of infrastructure. Our recommendation is that the exceptions in paragraph 3 are removed.

Policy OS1 Open Space and Recreation

We support this policy and would encourage the inclusion of wildlife habitats and ‘uncut’ spaces wherever possible in the district’s open spaces.

We question whether this is in alignment with the policies in Chapter 8, Natural Landscape and Biodiversity. We believe that where possible some open spaces should be left for rewilding and for biodiversity. We question what “improving the quality” means here? The focus should be for encouraging wildlife to flourish throughout our district. This paragraph needs to reflect current thinking regarding less mowing and maintenance. We suggest that this paragraph reads as follows:

“Where an adequate quantity of open space exists in the local area, consideration may be given to the use of the space and improving that space. As part of the review the biodiversity of the open space must be considered. All new or improved open space must include arrangements for long term nature enhancement by way of a land management plan.”

Policy ED1 – Education

We understand that a SEN school will be built in Swanley which will fulfil a need in the district and remove the requirement for such a place at the Pedham Place site.

Playing Pitch Strategy (2018)

We support the provision of sports pitches where there is a demonstrated need and all other options have been explored. However, any associated infrastructure/buildings should be focused on local/community need.

Policy SL1

We object to part of the current wording of this policy in the strongest possible terms. During a recent pop-up in Eynsford it was explained by Hannah Gooden that the ‘ambition to create a world class cluster of sporting facilities in the north of the District’ was only intended to refer to one new large scale sporting facility, the Wasps stadium and we would urge you to update the wording of this policy to reflect that, as currently written it leaves the door open for developers to propose many more. Given our longstanding experience with local large scale sporting facilities, Brands Hatch and the London Golf Club, we strongly question the benefits the transitory and seasonal visitors these facilities bring to the district and its economy. We are

very concerned that this extremely impactful proposal does not appear to have been communicated at all appropriately to residents.

We question whether the Council's "ambition" to create a world class cluster of sporting facilities in the North of the District is something that those living in this area wish to see. We note that the Palace of Westminster is closer to the two suggested Wasps sites than some areas of Sevenoaks District are to the two sites and we therefore question the validity of this consultation as representative of the community local to these sites. We have not seen any evidence at all to support the need for this policy.

If adopted, we are extremely concerned at the position this policy will put SDC in with future planning applications, appeals and High Court cases for anything which might remotely be described as a sporting facility. As an example, we note that it would be seemingly possible to rebrand the now withdrawn plans for the Las Vegas-style Sphere entertainment venue in Stratford as a boxing area, a type of sporting venue.

We are concerned that the scale of even just one large scale world class sporting facility in the first location likely to be proposed under this policy, near/in the proposed Wasps stadium, would dominate the local rural area altering its whole character and damaging the rural character of local villages, Crockenhill, Farningham and Eynsford. We are concerned about the loss of open countryside, well performing green belt and Kent Downs National Landscape. We note that the O2 Arena has a smaller capacity than the proposed Wasps stadium (excluding all the other development proposed for the 'Wasps complex'), is in London and is so much better served by public transport and active travel options yet has 2,000 associated parking spaces. We note that the potential location for the Wasps stadium on the west side of the M25 is likely to require further land for access.

There are no professional local rugby or football teams in the north of the district and therefore there is no need for a stadium. We note that Wasps doesn't actually exist as a club at the moment and given its recent bankruptcy and the financial health of rugby in general, its financial viability is clearly in question. We also note that the support for rugby and football teams tends to be based around geographic areas, most teams are named after particular areas and for the last decade Wasps stadium has been over 100 miles from the proposed new stadium site.

The north of the district has Brands Hatch racetrack, a popular and busy location which often causes traffic congestion and what many locals describe as noise nuisance and anti-social driving during race days. The road past Brands Hatch has been known locally as 'death hill' for decades. Our experience leads us to question the effectiveness of noise management plans for such facilities and we note the research which suggests noise pollution can cause adverse health outcomes. The London Golf Club, recently approved for a very large expansion and the recently approved Millwall Football club training ground/facility are also nearby. This part of the district is also close to a large number of world class sporting facilities in and around London, including the Olympic Stadium. The area does not need another large facility and certainly not a cluster of them.

We query why the north of district has been picked for a new sports complex. We refer you to your own map on page 234 of the last version of the neighbourhood plan, there are very few sports and leisure facilities in the central and south east areas of the district. Why is the focus not here for a large sporting complex if one is required? To place another large sporting complex to the north of the district will lead to further traffic and noise pollution which will

impact on the lives of those living in the area. There is a longstanding feeling that this area often gets a raw deal with planning compared to other areas in the district and these plans only compound that.

We note the emergence of the Darent Valley as a nationally recognised centre for nature conservation, particularly regenerative/conservation agriculture and wilding/rewilding and are very concerned about the impacts a large scale cluster of world class sporting facilities could have on that. Important local initiatives include the Darent Valley Landscape Recovery project, Kent Wildlife Trust's wilding of various sites, including the former Woodlands Golf Course, Preston Hill Country Park and a number of emerging private rewilding projects. Kent Wildlife Trust's 2019 Annual Report states 'The Darent Valley is rapidly becoming a focus for the exploration of new ways to deliver conservation through the application of extensive 'Wilding' approaches across the landscape.'

Given 93% of the district is green belt we are concerned that the ambitions of this policy cannot be met without developing areas which are currently assessed (by SDC commissioned reports, for instance Arup's January 2017 and June 2023 assessments) as well performing green belt. We are concerned that it would not be feasible to deliver a cluster of large scale, world class sporting facilities without severe light pollution and the inevitable impacts on the dark skies of the Kent Downs National Landscape. It is clear that this policy will lead to noise pollution, for example during the rugby matches and music concerts which are planned for the Wasps stadium. It is well known that noise pollution has significant impacts on the health and well-being of wildlife and animals and the abundance of wildlife to say nothing of the effects on people.

We also question whether a large-scale sporting complex will make a "valuable contribution to the health and wellbeing of the community." The health of the community will be improved by easily accessible local sports facilities and open spaces available for walking, cycling and outdoor recreation rather than spectator sports, particularly those strongly associated with excessive alcohol consumption. For instance, <https://www.totalrl.com/report-finds-rugby-league-supporters-the-booziest-in-the-uk/> references a survey which finds over 80% of rugby spectators drink an average of 4 drinks per hour. We are concerned about potential anti-social issues which might be caused by a small minority of spectators after consuming large amounts of alcohol, for instance <https://www.theguardian.com/sport/2019/aug/10/hooliganism-threat-rugby-league>. We question the safety (drink driving) implications of making private car the most rational (ie convenient) transportation choice for such events.

Studies show that health and wellbeing is significantly improved by being with nature in green spaces and by participating in, rather than watching, sports. We note the emerging research which suggests a number of adverse health outcomes for players of such contact sports and therefore question the soundness of essentially promoting rugby union, a sport where hard and often brutal contact is intrinsic, for instance: <https://www.alzheimers.org.uk/news/2022-10-05/new-research-suggests-ex-rugby-players-twice-likely-develop-dementia>.

We believe that that large scale sporting facilities will do little to address the clear and recognised need to 'level up' parts of the north of the district, particularly around Swanley. We are very concerned that large scale stadium type facilities near to Swanley will severely curtail the ability to ever level up the area given the expected serious noise, anti-social behaviour, congestion, noise and general disturbance from such facilities and the relative undesirability of residential and office area closes to such facilities. We strongly believe that the relatively small

number of low paid, part time/zero hours and seasonal jobs that such facilities tend to provide is absolutely not the type of investment this area needs and is capable of attracting.

We are concerned that large scale sporting facilities could be repurposed for other, more inappropriate, uses should their original purpose fail and we note the precarious financial position and history of several well-known sporting clubs, including Wasps. We note that a successful noise nuisance or licensing act claim against a venue which does not benefit from prescription (long-use) could force its unviability/closure and therefore necessitate an alternative use.

We understand a new train station and improvements to junction 3 would likely have to be built to facilitate the first development likely to be proposed under this policy (Wasps stadium complex) and we question the wisdom of such large investments given what we believe to be the fundamental unsoundness of policy SL-1. We strongly question the economic benefits of such facilities to the borough, given that visitors will be transitory and just passing through the local area, as we see with our existing large scale sporting facilities.

We believe that siting large scale sporting facilities next to such a major motorway is simply baking in private car dependence during a climate emergency and is directly contrary to accepted mechanisms to achieve transport modal shift and future compliance with a range of national policies. We note the encouraging actions many other local authorities have been adopting in this respect, often motivated by national policy. We note the longstanding AQMAs which were in place (and the current AQMA starting near MX-15 and covering Swanley centre) in the north of the district until 2022 and question how policy SL-1 can realistically be implemented without causing severe air quality issues. The MX-15 promoters presentation shows rugby pitches next to the M25 and we question the wisdom and desirability of putting such facilities in and directly next to an area which was an AQMA for 20 years until last year with extremely noisy traffic. We wonder how many world class athletes will want to train and play in such a location. We note emerging research on the health implications of air pollution, particularly during physical exertion and wonder what the legal framework around corporate liability may look like in several decades. We note that save for building a sealed dome, it is not possible sports teams to substantially mitigate the local effects of air pollution. Whilst we welcome the transition to electric vehicles we note the increased pollution from tyre wear their extra weight causes and we are concerned about the serious health implications which research is beginning to uncover, for instance:

<https://www.theguardian.com/environment/2023/jul/05/time-to-worry-about-car-tyre-pollution-chris-whitty-tells-mps>

<https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions>

Given that articles (for instance, <https://www.theguardian.com/sport/2023/apr/13/wasps-plan-new-wasps-nest-stadium-and-return-to-premiership-by-2025-26> highlight that most of the 'Wasps' stadium revenues are not expected to come from rugby from 2028 onwards, we wonder if it's appropriate to refer to these facilities sporting facilities. Our MP tells us that music concerts are planned for this stadium and we wonder how these could be described as 'brand leveraged'.

The Guardian also revealed that Wasps intend that their "rugby revenues will account for less than 50 per cent of the club's total revenues by 2028," while "brand leveraged revenues from other stadium activities bring in an estimated £7 million a year from 2027 onwards."

We believe that SDC should focus its attention on housing provision rather than this sort of unnecessary development in an already overstretched area.

Clause/section 2 of the proposed policy SL-1 supports the retention of sports facilities. The building of a stadium at Pedham Place would result in the loss of a popular golf course, this would be the 5th golf course to close locally in the last 10 years. We question how the first site (Wasps) likely to be proposed under this policy aligns with that. Replacing a very large participatory sports venue with a much smaller venue where only scores of people actually play sport and the rest spectate, mostly drinking alcohol.

Policy COM1 – Retention of Community Uses

We support this policy and would object to the loss of Pedham Place golf course, a popular local facility.

Chapter 10 – Transport

We support the objectives in this chapter but note that much of the district is reliant on cars as access to public transport is poor in most areas. More investment is needed in the local bus services to enable residents to see that as a viable alternative.

Policy T1 – Sustainable Movement Network

We support this policy. SDC need to consider rural locations and how to improve bus routes, park and rides schemes and bus connections to stations. We were surprised to see no mention of community car share schemes. There is also much to be done to improve the electric car charging network especially in rural areas and we would have liked to have seen more emphasis on promoting electric car use. We would also encourage the council to consider further charging infrastructure such as attached to lampposts or other street architecture already carrying electric current. In addition, rapid chargers need to be installed in strategic areas to facilitate drivers on longer journeys. We support the improvement of the local cycling and walking network.

Policy T3 - Vehicle Parking

We are pleased to see the approach to vehicle parking will be considered in accordance with the sustainable movement network. Promoting the use of transport hubs and more sustainable travel will not be effective if car use and parking is easy to achieve. Conversely, unless public transport is improved, people will continue to need car parking.

Many villages do have issues with roadside parking due to old properties being built prior to the age of the car. It is suggested that new developments should be required to provide residential parking within the curtilage of the property and not roadside. We would suggest that all new developments are obliged to install electric car charging points.

We welcome the priority given to walking and cycling and hope this will be reflected in more cycle paths and safe walking paths. A Darent Valley LCWIP would be helpful.